

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CALEB BARNETT, <i>et al.</i> , <i>Plaintiffs</i> , v. KWAME RAOUL, <i>et al.</i> , <i>Defendants</i> .	Case No. 3:23-cv-209-SPM ** designated Lead Case
DANE HARRELL, <i>et al.</i> , <i>Plaintiffs</i> , v. KWAME RAOUL, <i>et al.</i> , <i>Defendants</i> .	Case No. 3:23-cv-141-SPM
JEREMY W. LANGLEY, <i>et al.</i> , <i>Plaintiffs</i> , v. BRENDEN KELLY, <i>et al.</i> , <i>Defendants</i> .	Case No. 3:23-cv-192-SPM
FEDERAL FIREARMS LICENSES OF ILLINOIS, <i>et al.</i> , <i>Plaintiffs</i> , v. JAY ROBERT “JB” PRITZKER, <i>et al.</i> , <i>Defendants</i> .	Case No. 3:23-cv-215-SPM

JOINT STATEMENT OF STIPULATED FACTS

Plaintiffs Dane Harrel, C4 Gun Store, LLC, Marengo Guns, Inc., Illinois State Rifle Association, Firearms Policy Coalition, Inc., and Second Amendment Foundation (“*Harrel* plaintiffs”); Jeremy W. Langley, Timothy B. Jones, and Matthew Wilson (“*Langley* plaintiffs”); Caleb Barnett, Brian Norman, Hood’s Guns & More, Pro Gun and Indoor Range, and National Shooting Sports Foundation, Inc. (“*Barnett* plaintiffs”); Federal Firearms Licensees of Illinois, Guns Save Life, Gun Owners of America, Gun Owners Foundation, Piasa Armory, Jasmine Young, and Chris Moore (“*FFL* plaintiffs”) (together, “Plaintiffs”), and Defendants Illinois

Attorney General Kwame Raoul, Governor JB Pritzker, and State Police Director Brendan F. Kelly (together, “State Defendants”), and the Randolph County Defendants (Jarrod Peters and Jeremy Walker), jointly, stipulate to the following facts:

1. Individual plaintiffs are adult residents of Illinois. Barnett Decl. ¶ 2; Norman Decl. ¶ 2; Young Decl. ¶ 2; Moore Decl. ¶ 2; Harrel Decl. ¶ 2; Langley Decl. ¶ 2; Jones Decl. ¶ 2; Wilson Decl. ¶ 2.

2. Plaintiff Harrel is a member of ISRA, SAF, and FPC. Harrel Decl. ¶ 3.

3. Plaintiff National Shooting Sports Foundation (“NSSF”) is a Connecticut nonprofit, tax-exempt, non-stock corporation with its principal place of business in Connecticut. Keane Decl. ¶ 4.

4. Plaintiff NSSF is the trade association for the firearm, ammunition, and hunting and shooting sports industry and has more than 10,000 members. Keane Decl. ¶ 5.

5. Plaintiff Federal Firearms Licensees of Illinois (“FFL-IL”) is an Illinois-based 501(c)(4) non-profit corporation whose members include primarily federally licensed firearm dealers located throughout Illinois. Eldridge Decl. ¶ 2.

6. Plaintiff Gun Owners of America, Inc. (“GOA”) is a California non-stock corporation and a not-for-profit membership organization with its principal place of business in Springfield, Virginia. Pratt Decl. ¶ 2.

7. Plaintiff GOA has more than 2 million members and supporters across the country, including thousands of Illinois residents. Pratt Decl. ¶ 2.

8. Plaintiff Gun Owners Foundation (“GOF”) is a Virginia non-stock corporation and a not-for-profit legal defense and educational foundation with its principal place of business in Springfield, Virginia. Pratt Decl. ¶ 3.

9. Plaintiff Guns Save Life (“GSL”) is an Illinois not-for-profit corporation, with its principal place of business in Illinois. Boch Decl. ¶ 2.

10. Plaintiff GSL represents many members and supporters throughout Illinois in teaching and training them proper and safe firearm possession and usage. Boch Decl. ¶ 3.

11. Plaintiff Illinois State Rifle Association (“ISRA”) is a non-profit membership organization with its principal place of business in Chatsworth, Illinois. Pearson Decl. ¶ 2.

12. Plaintiff ISRA has more than 26,000 members and supporters in Illinois and many members outside Illinois. Pearson Decl. ¶ 2.

13. Plaintiff Firearms Policy Coalition, Inc. (“FPC”) is a 501(c)(4) non-profit membership organization incorporated under the laws of Delaware with its principal place of business in Clark County, Nevada. Combs Decl. ¶ 2.

14. Plaintiff Second Amendment Foundation (“SAF”) is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. Gottlieb Decl. ¶ 2.

15. Plaintiff SAF has over 650,000 members and supporters nationwide, including thousands in Illinois. Gottlieb Decl. ¶ 2.

16. Retailer plaintiffs are retail firearms businesses located in Illinois. Hood Decl. ¶ 2; Smith Decl. ¶ 2; Pulaski Decl. ¶ 2; Brooks Decl. ¶ 3; DeBock Decl. ¶ 3.

17. Retailer plaintiffs are authorized to sell firearms as a Federal Firearms Licensee licensed by the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). Hood Decl. ¶ 4; Smith Decl. ¶ 4; Pulaski ¶ 2; Brooks Decl. ¶ 3; DeBock Decl. ¶ 3.

18. Retailer plaintiff Hood’s Guns & More (“Hood’s”) is located in Benton, Illinois, and owned by James Hood. Hood Decl. ¶ 2.

19. Retailer plaintiff Pro Gun and Indoor Range (“Pro Gun”) is located in Marion, Illinois, and co-owned by Paul Smith. Smith Decl. ¶ 2.

20. Retailer plaintiff Piasa Armory is located in Alton, Illinois. Pulaski ¶ 2.

21. Retailer plaintiff C4 Gun Store, LLC is principally located in Sparta, Randolph County, Illinois. Brooks Decl. ¶ 3.

22. Retailer Marengo Guns, Inc. is principally located in Marengo, McHenry County, Illinois. DeBock Decl. ¶ 3.

23. Some retailer plaintiffs are members of NSSF. Keane Decl. ¶ 10.

24. Retailer plaintiff Piasa is a member of FFL-IL. Eldridge Decl. ¶ 5.

Date: September 11, 2024

Respectfully submitted,

PAUL D. CLEMENT*
ERIN E. MURPHY*
MATTHEW D. ROWEN*
NICHOLAS A. AQUART *
CLEMENT & MURPHY, PLLC
706 Duke Street
Alexandria, VA 22314
(202) 742-8900

* *pro hac vice*

/s/ Andrew A. Lothson
ANDREW A. LOTHSON (*pro hac vice*)
SWANSON, MARTIN & BELL, LLP
330 N. Wabash
Suite 3300
Chicago, IL 60611
alothson@smbtrials.com

GARY C. PINTER
SWANSON, MARTIN & BELL, LLP
103 W. Vandalia Street
Suite 215
Edwardsville, IL 62025
(618) 655-3131
gpinter@smbtrials.com

Counsel for Plaintiffs Caleb Barnett, Brian Norman, Hood's Guns & More, Pro Gun and Indoor Range, and National Shooting Sports Foundation, Inc.

s/ David G. Sigale (with permission)

DAVID G. SIGALE (ATTY. ID # 6238103)
LAW FIRM OF DAVID G. SIGALE, P.C.
55 West 22nd Street, Suite 230
Lombard, IL 60148
630.452.4547
dsigale@sigalelaw.com

Counsel for Plaintiffs Dane Harrel, C4 Gun Store, LLC, Marengo Guns, Inc., Illinois State Rifle Association, Firearms Policy Coalition, Inc., and Second Amendment Foundation

Mark L. Shaw, Esq.
Jennifer Craigmile Neubauer, Esq.
Michael A. Danforth, Esq.
SHAW LAW LTD.
33 North County Street, Suite 300
Waukegan, Illinois 60085
(T): (847) 244-4696
(F): (847) 244-4673
(E-1): mlshaw@shawlawltd.com
(E-2): jcneubauer@shawlawltd.com
(E-3): michael@danforthlawgroup.com

s/ Sean A. Brady (with permission)

SEAN A. BRADY, Esq.*
C.D. MICHEL, Esq.*
KONSTADINOS T. MOROS, Esq.*
MICHEL & ASSOCIATES, P.C.
180 East Ocean Blvd., Suite 200
Long Beach, CA 90802

** pro hac vice*

Counsel for Plaintiffs Federal Firearms Licensees of Illinois, Guns Save Life, Gun Owners of America, Gun Owners Foundation, Piasa Armory, Debra Clark, Jasmine Young, and Chris Moore

s/Thomas G. Maag

Maag Law Firm, LLC
22 West Lorena Avenue
Wood River, IL 62095
618-216-5291
tmaag@maaglaw.com

Counsel for Plaintiffs Jeremy W. Langley, Timothy B. Jones, and Matthew Wilson

/s/ Christopher G. Wells
Christopher G. Wells, No. 6304265
Kathryn Hunt Muse, No. 6302614
Office of the Attorney General
115 S. LaSalle St.
Chicago, IL 60603
(312) 814-3000
Kathryn.Muse@ilag.gov
Christopher.Wells@ilag.gov

*Counsel for State Defendants Governor
J.B. Pritzker, Attorney General Kwame
Raoul, and ISP Director Brendan Kelly*

/s/ Katherine F. Asfour (with permission)
Katherine F. Asfour
Evans & Dixon, L.L.C.
211 N. Broadway, Suite 2500
St. Louis, MO 63102
314-621-7755
kasfour@evans-dixon.com
*Counsel for the Randolph County
defendants (Jarrod Peters and Jeremy
Walker)*

CERTIFICATE OF SERVICE

The undersigned attorney certifies that a copy of the foregoing was served upon counsel of record for the Defendants by e-mail on September 11, 2024.

/s/ Andrew A. Lothson
Andrew A. Lothson